

**Glass, Molders, Pottery, Plastics & Allied Workers  
International Union**  
(AFL-CIO, CLC)

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**VIA UPS OVERNIGHT**

**October 30, 2003**

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**California Energy Commission  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814**

**To Whom It May Concern:**

**Subject: 2005 Building Energy Efficiency Standards, 45 Day Language Express Terms**

The Glass, Molders, Pottery, Plastics and Allied Workers International Union would like to submit these comments to the 2005 Building Energy Efficiency Standards.

The CEC protocol does not require stabilized cellulose insulation installed with water to meet any drying criteria. Moisture content directly affects thermal conductivity of cellulose insulation, the settling of the material and can cause moisture related problems in homes if the material is enclosed in a wall while wet.

The Federal Trade Commission recognizes the importance of providing drying time information. On July 15, 2003, the Federal Trade Commission (FTC) issued a proposed rule on the labeling and advertising of home insulation.

The Federal Register/Vol. 68, No. 135, page 41885, contains the following statement:

**“Finally, the Commission notes that if there is information, such as drying times, that are important to the proper installation of the materials in question [stabilized cellulose], manufacturers should disclose that information.”**


The Cellulose Insulation Manufacturers Association Technical bulletin #3 Standard Practice for the Installation of Sprayed Cellulosic Wall Cavity Insulation contains the following statement:

**Normal drying will occur within 24 to 48 hours depending upon climatic conditions, depth of fill, and initial moisture content. The manufacturer's recommended drying times shall be followed.**

In conclusion, we urge the CEC to include drying time information on cellulose insulation. In addition, we strongly recommend the CEC require inspectors verify that all insulation is dry before closing up the wall cavity. This is critical to the quality of the insulation installation.

Thank you for your consideration.

Sincerely,



Ignacio De La Fuente  
International Vice President